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Counsel for Plaintiff and the Putative Class

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SARAH BLANSETTE, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

RAEL, INC.,

Defendant.

Case No. 4:23-cv-00006-HSG

The Honorable Haywood S. Gilliam, Jr.

**JOINT STIPULATION AND ORDER TO  
EXTEND PLAINTIFF'S DEADLINE TO  
FILE FIRST AMENDED COMPLAINT  
AND DEFENDANT'S RESPONSIVE  
DEADLINE**

***RECITALS***

***WHEREAS:***

1. On January 3, 2023, Plaintiff Sarah Blansette (“Plaintiff”) filed her Complaint (“Complaint”). (Doc. No. 1.)

2. On March 13, 2023, Defendant Rael Inc. (“Rael”) filed a Motion to Dismiss the Complaint. (Doc. No. 17.)

3. Argument on the Motion to Dismiss is currently scheduled for June 8, 2023.

4. On March 27, 2023, Plaintiff informed Defendant that she would be filing a First Amended Complaint (“FAC”) in lieu of filing an opposition to the Motion to Dismiss.

5. The current deadline to file the FAC is April 3, 2023.

6. In the days preceding this deadline, the attorney drafting the FAC for Plaintiff suffered a medical event, and Plaintiff requested an extension of the FAC’s filing deadline.

7. As a result, Plaintiff’s counsel and Defendant’s counsel have agreed to extend Plaintiff’s deadline to file the FAC one week to April 10, 2023.

8. Further, Plaintiff’s counsel and Defendant’s counsel have agreed that Defendant’s response to any FAC, including any motion to dismiss, will be due 21 days after the filing of a FAC.

9. The parties’ proposed schedule will not impact any other pending deadlines, as the Court has not issued a scheduling order.

10. This is the parties’ first request for an extension of time to modify Plaintiff’s deadline to file a FAC, and the request is not made for the purposes of delay.

***STIPULATION***

***NOW, THEREFORE,*** the Parties stipulate and agree as follows, subject to Court approval:

1. Plaintiff’s deadline to file a FAC is extended from April 3, 2023 to April 10, 2023.

2. Defendant’s response to any FAC, including any motion to dismiss, will be due 21 days after the filing of any FAC.

1 IT IS SO STIPULATED AND AGREED, THROUGH COUNSEL OF RECORD:

2  
3 DATED: April 3, 2023

GOOD | GUSTAFSON | AUMAIS LLP

4 By: /s/ J. Ryan Gustafson  
5 J. Ryan Gustafson

6 Counsel for Plaintiff Sarah Blansette and the  
7 Putative Class

8  
9 DATED: April 3, 2023


RUTAN & TUCKER, LLP

10 By: /s/ Lucas Hori<sup>1</sup>  
11 Lucas Hori

12 Counsel for Defendant  
13 Rael, Inc.

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15  
16 PURSUANT TO STIPULATION, IT IS SO ORDERED:

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18 DATED: 4/4/2023

19 By:   
20 The Honorable Haywood S. Gilliam, Jr.  
21 United States District Judge

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26  
27 <sup>1</sup> Pursuant to Civil Local Rule 5-1(i)(3), I, J. Ryan Gustafson, hereby attest that concurrence in the filing  
28 of this document has been obtained from Lucas Hori, counsel for Defendant.